## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

Turtle Island Foods, SPC, et al.	)	
	)	
Plaintiffs,	)	
	)	
V.	)	No. 2:18-cv-4173
	)	
Mark Richardson, et al.	)	
	)	
Defendants.	)	

## PLAINTIFFS' CONSENT MOTION FOR EXTENTION OF TIME

Come now the Plaintiffs and move this Court to extend the time to file Plaintiffs' Reply Suggestions in Support of Plaintiffs' Motion for Summary Judgment and Reply Suggestions in Support of Plaintiffs' Motion for Class Certification. In support, Plaintiffs state:

- 1. Plaintiffs filed their Motion for Preliminary Injunction and Suggestions in Support on October 30, 2018. ECF Nos. 23-24.
- 2. Plaintiffs filed their Motion for Class Certification and Suggestions in Support on November 29, 2018. ECF Nos. 31-32.
- 3. The State of Missouri filed an unopposed Motion to Intervene on November 26, 2018. ECF Nos. 19-20.
- 4. The State of Missouri's Motion to Intervene was granted on December 7, 2018. ECF No. 33.
- 5. Defendant Richardson responded to Plaintiffs' Motion for Preliminary Injunction but indicated that he takes no position on whether an injunction is proper and

therefore does not oppose entry of the same if this Court finds it proper. ECF No. 25. Defendant Richardson did not file a response to the Motion for Class Certification.

- 6. The State of Missouri filed Suggestions in Response to both the Motion for Preliminary Injunction and the Motion for Class Certification on December 28, 2018. ECF Nos. 37-38.
- 7. Plaintiffs' replies to both pending motions are currently due on January 11, 2019.
- 8. Because of the press of other business, including oral argument at the Eighth Circuit Court of Appeals on January 15, 2019, a one-week extension is requested, up to and including January 18, 2019, to file Reply Suggestions in Support to both the Motion for Preliminary Injunction and Motion for Class Certification.
- 9. The State of Missouri has been contacted and consents to a one-week extension, up to and including January 18, 2019.

Respectfully submitted,

/s/ Anthony E. Rothert
Anthony E. Rothert, #44827
Jessie Steffan, #64861
ACLU of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63101
Phone: (314) 652-3114

Gillian R. Wilcox, #61278 ACLU of Missouri Foundation 406 W. 34th Street, Suite 420 Kansas City, MO 64111 Phone: (816) 470-9938 Matthew Liebman\*
Amanda M. Howell\*\*
Alene Anello\*
Animal Legal Defense Fund
525 E. Cotati Ave.
Cotati, California 94931
Phone: (707) 795-2533

Jessica Almy\*
The Good Food Institute
1380 Monroe St. NW #229
Washington, DC 20010
Phone: (866) 849-4457

\* admitted *pro hac vice* \*\* *pro hac vice* pending

**Attorneys for Plaintiffs** 

## **CERTIFICATE OF SERVICE**

I certify that on January 8, 2019, I filed a copy of the foregoing electronically with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Anthony E. Rothert